☎ Southwestern Bell Corporation

March 24, 1994

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Michael W. Bennett
Director
Federal Regulatory

<u>Ex Parte</u>

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: <u>CC Docket No. 93-252</u>

In accordance with Commission rules governing ex parte presentations, please be advised that yesterday, March 23rd, Mr. Wayne Watts, Vice President-General Attorney (Southwestern Bell Mobile Systems), Ms. Kellye Abernathy, Manager-Regulatory Services (Southwestern Bell Mobile Systems), Mr. William Blase, Director-Federal Regulatory, and the undersigned met with Mr. Greg Vogt, Ms. Barbara Esbin, and Ms. Judy Argentieri, all from the Tariff Division of the Common Carrier Bureau, regarding the proceeding listed above. Attached is a handout provided in the meeting.

If you have any questions, please let me know.

Sincerely,

Michael W. Bennett

Attachment

cc: Mr. Greg Vogt
     Ms. Barbara Esbin
     Ms. Judy Argentieri

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List ABCDE

FCC REGULATION OF CMRS PROVIDERS

- **Parity in regulatory structure for all CMRS providers**

- **The public is better served with no Equal Access obligations.**

- **What constitutes "Parity" in Equal Access Obligations?**

    - **Ability of customers of CMRS providers to choose IXC to handle long distance calls;**

    - **Calling Scope Parity
    "The Line" must be drawn in the same place for all CMRS providers;**

    - **IXC Marketing Parity;**

    - **Implementation Parity.**

- **CMRS providers should have the ability, but not the obligation to interconnect with one another.**

    - **Mandatory interconnection to the LEC is sufficient.**

- **The market will establish where interconnection among CMRS providers makes sense.**
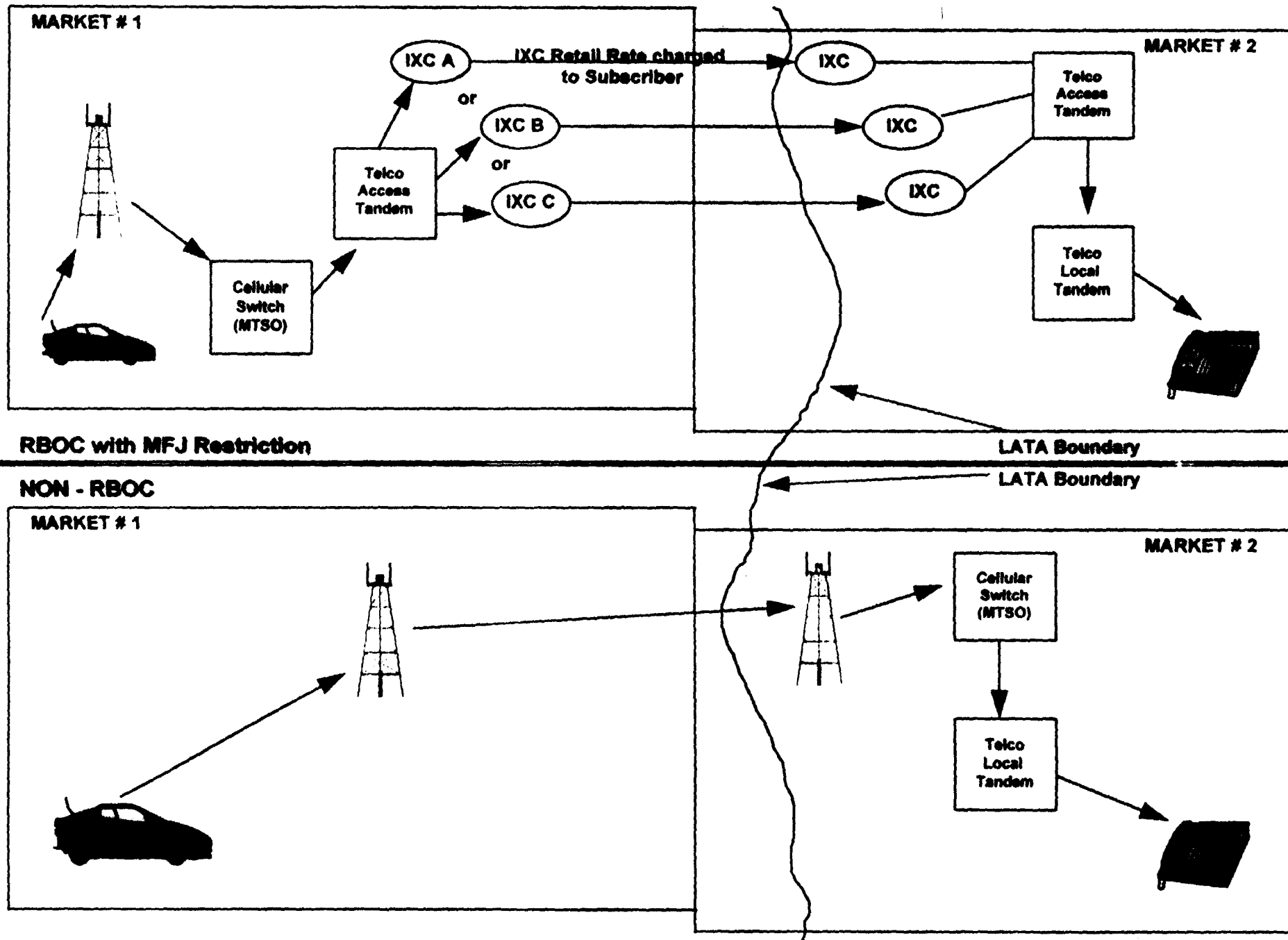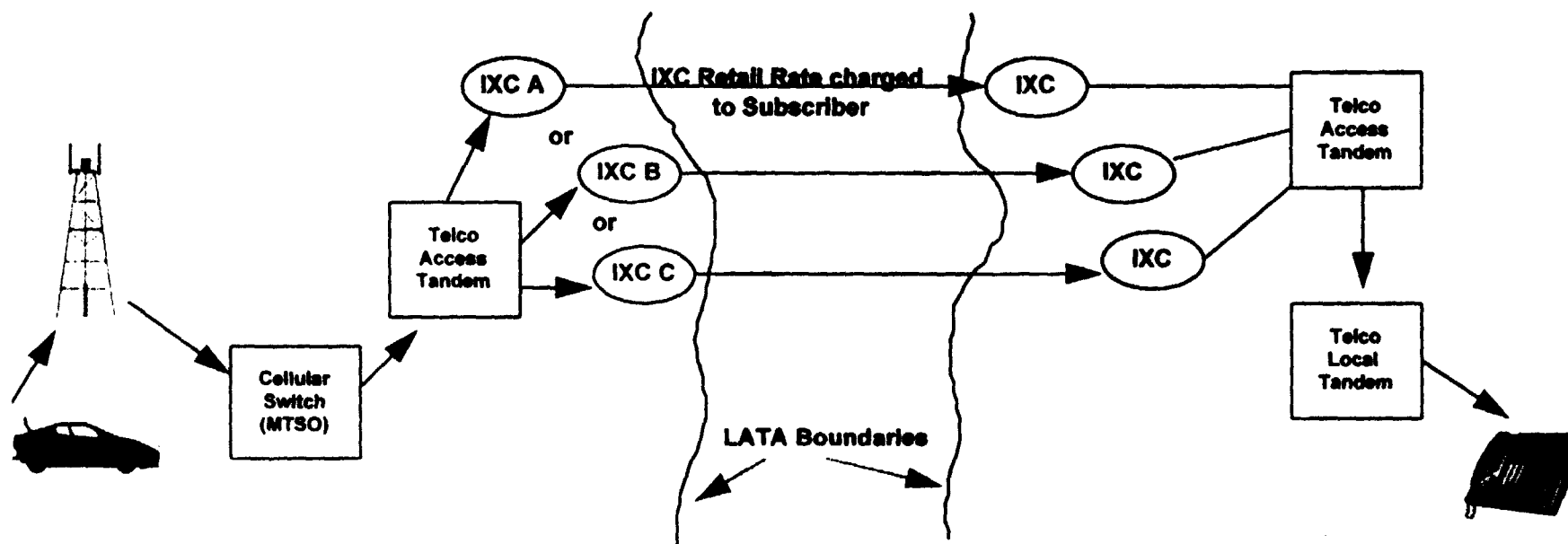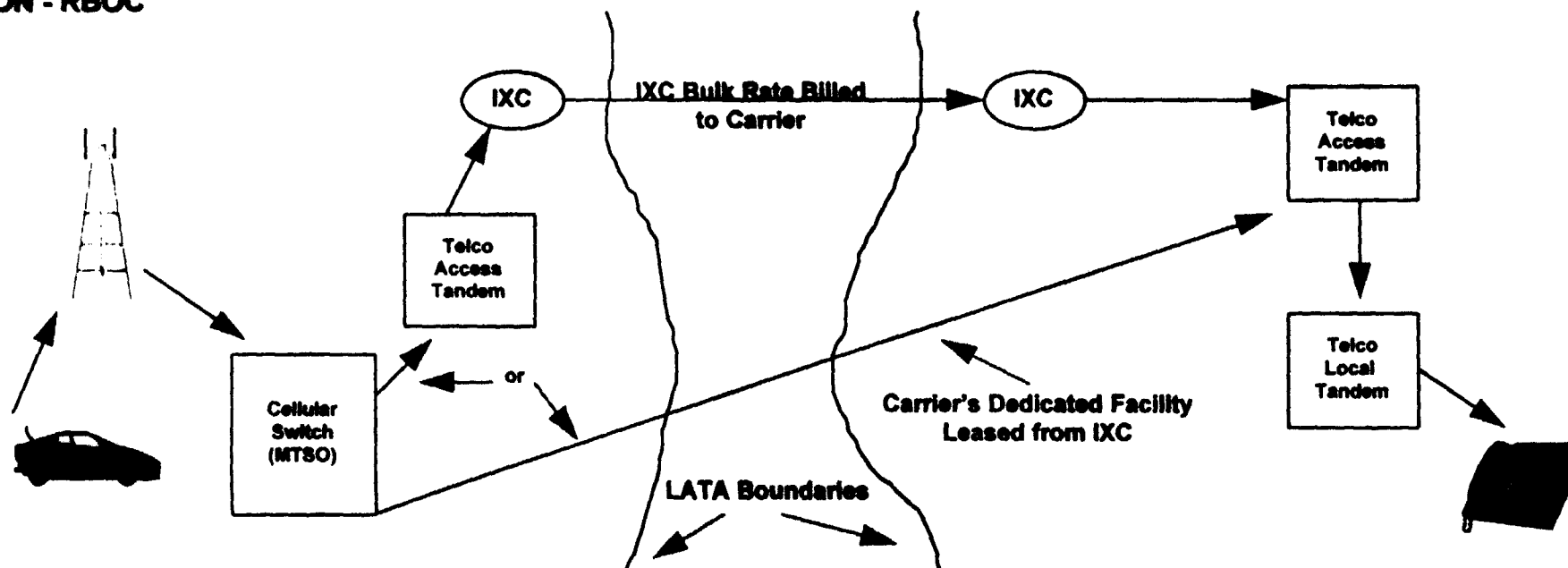
Figure A - Local Calling Scopes

MARKET # 1

IXC A

or

IXC Retail Rate charged to Subscriber

IXC

MARKET # 2

Telco Access Tandem

Telco Access Tandem

IXC B

or

IXC

IXC C

IXC

Telco Local Tandem

Cellular Switch (MTSO)

RBOC with MFJ Restriction

LATA Boundary

NON - RBOC

LATA Boundary

MARKET # 1

MARKET # 2

Cellular Switch (MTSO)

Telco Local Tandem

Figure B - Long Distance Calls

RBOC with MI-J Restriction

NON - RBOC

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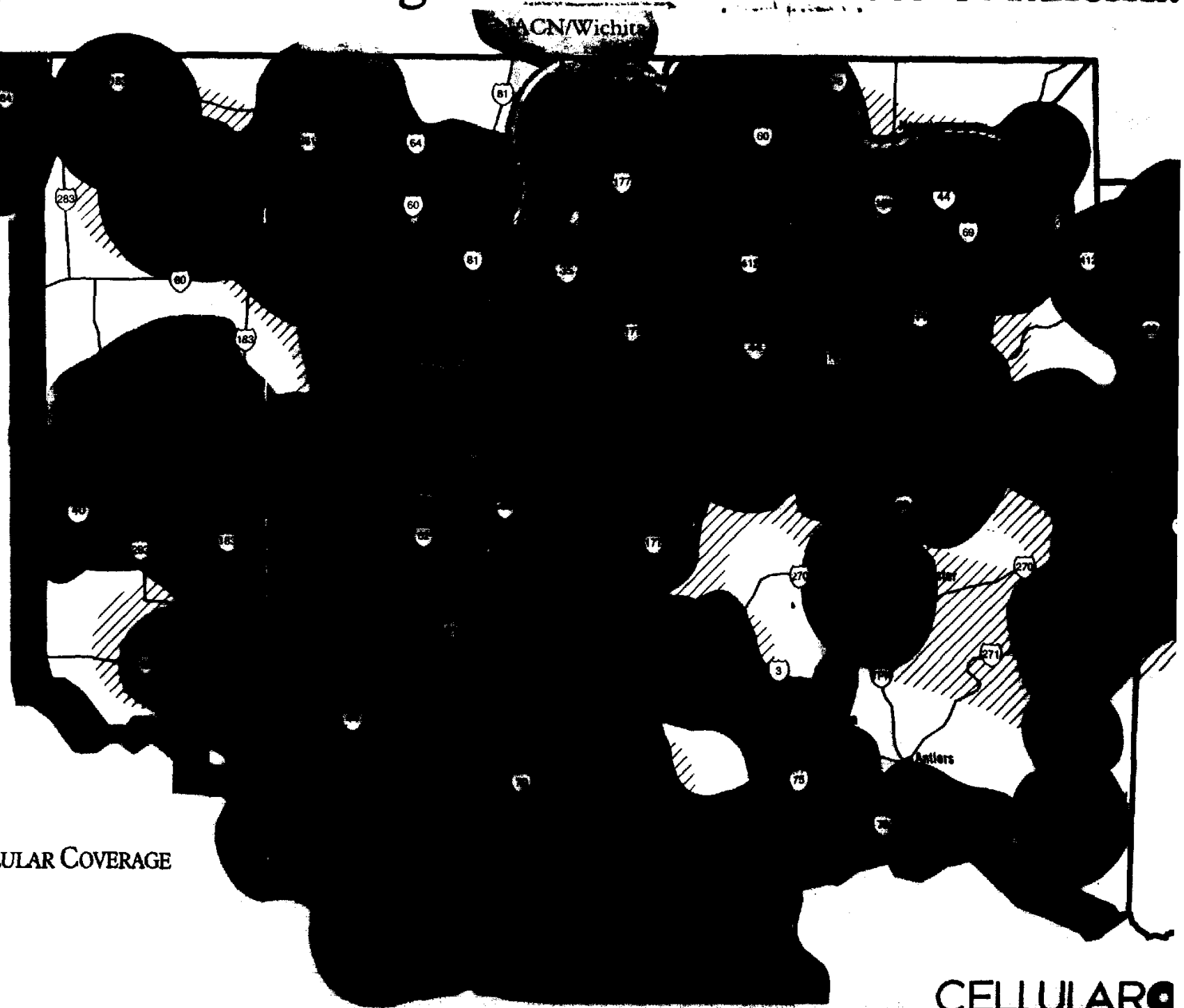
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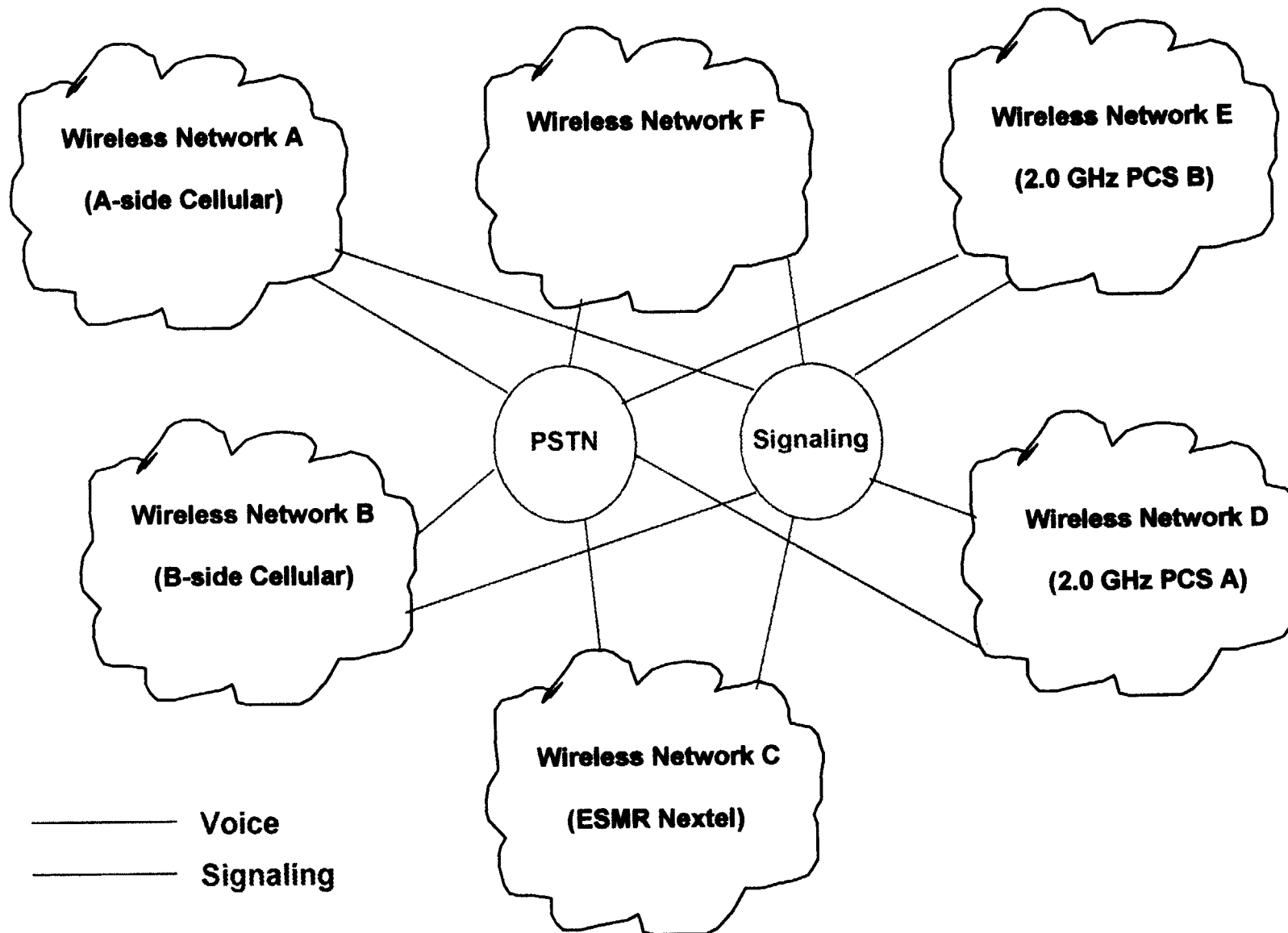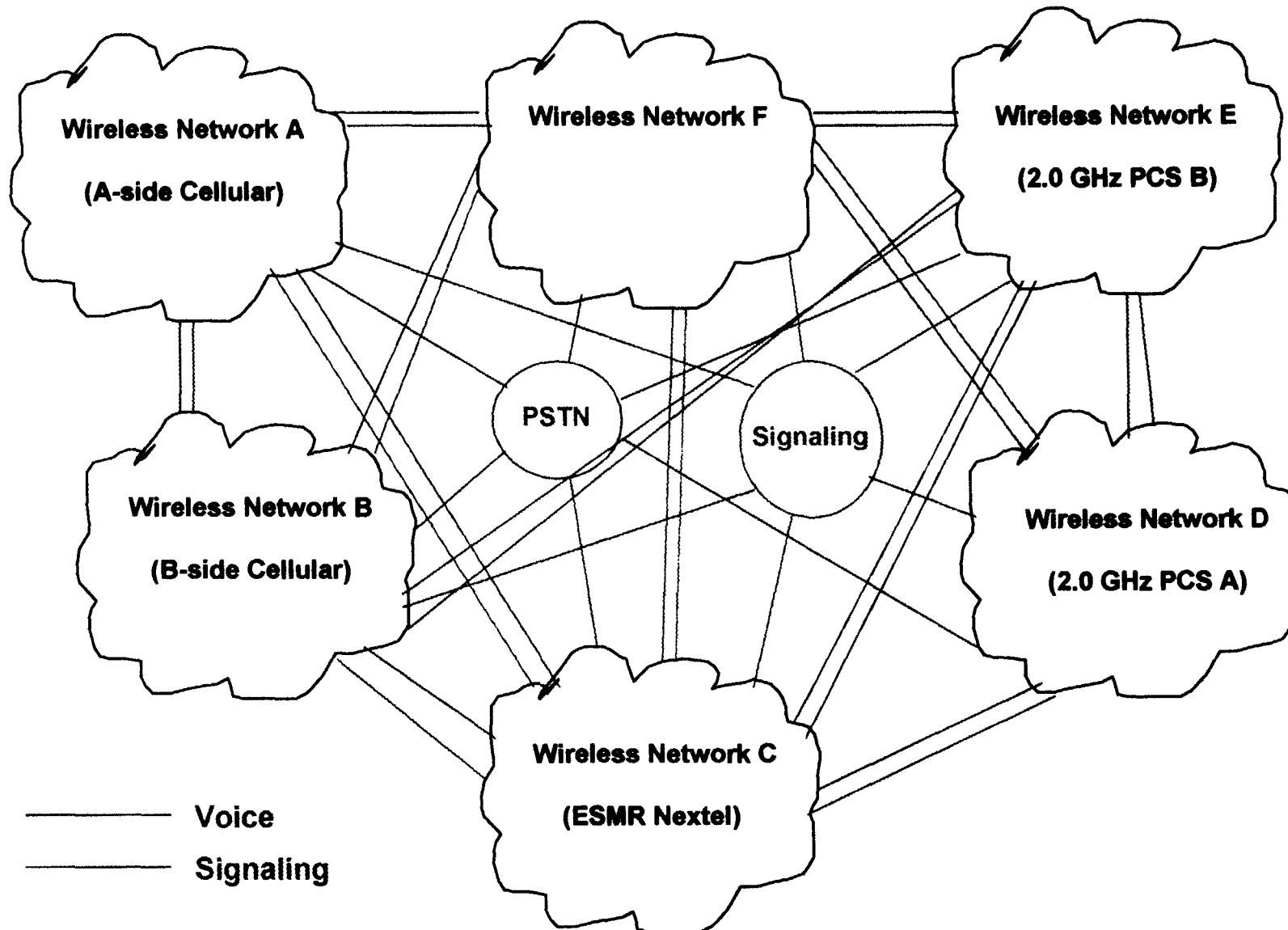OTHER CELLULAR ONE COVERAGE   OTHER CELLULAR COVERAGE

FUTURE COVERAGE

CELLULAR

Wireless Network Interconnection
Mandatory PSTN and Signaling <u>Backbone</u> Access

Wireless Network Interconnection
Mandatory Access between <u>All</u> Providers

Wireless Network Interconnection
IS-41 SS7 Message Flow

Wireless Network F

Wireless Network A

(A-side Cellular)

HLR

Wireless Network E

(2.0 GHz PCS B)

PSTN

Signaling

Wireless Network B

(B-side Cellular)

Wireless Network D

(2.0 GHz PCS A)

Wireless Network C

(ESMR Nextel)

IS-41 SS7 Messages